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21 Aug 1992

From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: FEDERAL FACILITY AGREEMENT , EXTENSION REQUEST FOR OPERABLE
UNIT III, NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX

Encl: (1) Attachments 1 through 7
(2) Proposed Revised Schedule for OU III

1. During the Technical Review Committee (TRC) meeting of 12 May 1992, the agencies were formally notified that the Navy was investigating a problem with data quality on samples collected under the Phase 2A field work performed during the period between October to December 1990. The chronology of events which led to the rejection of significant portions of the Phase 2A data for Operable Units (OUs) I, III, and IV was presented during the Hunters Point Annex (HPA) Remedial Project Managers (RPMs) meeting on June 2, 1992.

2. In addition, recent review of air photos and further evaluation of existing data identified data gaps not previously apparent, which require contingency work at OU III. A preliminary work plan addendum to accomplish the resampling and to initiate contingency work was presented at the June 2 meeting. The Navy immediately began the required additional field sampling to collect data to fill the existing data gaps (resampling and contingency needs) in order to proceed with the Remedial Investigation (RI) report for OU III.

3. The additional work, currently underway, will impact the existing Federal Facility Agreement (FFA) schedule for OU III. Therefore, per Section 9 of the HPA FFA, the Navy is requesting an extension of the FFA schedule for OU III. The extension being requested for the OU III draft RI report is approximately 20 weeks. Per Section 9.1 of the FFA, an appropriately annotated partial summary matrix is set out below.

<u>Deliverable</u>	<u>Original Due Date</u>	<u>Extension Sought</u>	<u>Revised Due Date</u>
Draft RI	8/21/92	20 weeks	1/04/93
Draft PHEE	11/05/92	18 weeks	3/05/93
Draft FS	1/11/92	16 weeks	5/06/93

The Navy is also requesting extensions for those documents following the draft RI through the final ROD. The proposed extension dates requested are presented in enclosure (2).

4. In accordance with EPA's memorandum from Roberta Blank to Ray Chiang of this office, dated April 25, 1992, which stated that the EPA did not wish to receive Summary of Findings Memoranda or Draft Initial Screening of Alternatives (DISA), the DISA for OU III has been deleted from the schedule (Attachment 7 in enclosure 1) and from the revised list of deliverable due dates (enclosure 2).

5. Please be advised that the work plan addendum and the schedule submitted on June 2, 1992 were revised to comply with the agencies' request for the Navy to submit only fully validated and complete reports. The revisions include eight contingency phase borings at IR-4 (Borings 19, 20, 26, 28, 44, 45, 46 and 47), and one contingency phase boring and one contingency monitoring well for IR-5 (Boring 86 and Well MW85A). These revisions are shown in enclosure (1), which consists of Attachments 1 through 7. Attachments 1 and 2 show proposed sampling locations; Attachment 3 summarizes the completed and proposed scope of work; Attachments 4 and 5 summarize the proposed sampling and analysis plan; Attachment 6 presents the rationale for proposed sampling locations, and Attachment 7 is the detailed schedule for the field work and subsequent RI, PHEE and FS reports for OU III.

6. Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Louise Lew, Code 1811, (415) 244-2551).

Original signed by:

MICHAEL A. MIGUEL
By direction

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ENCLOSURE (1)

ATTACHMENT 1 OF 7

FEDERAL FACILITY AGREEMENT (FFA)
EXTENSION REQUEST FOR OPERABLE UNIT
(OU) III

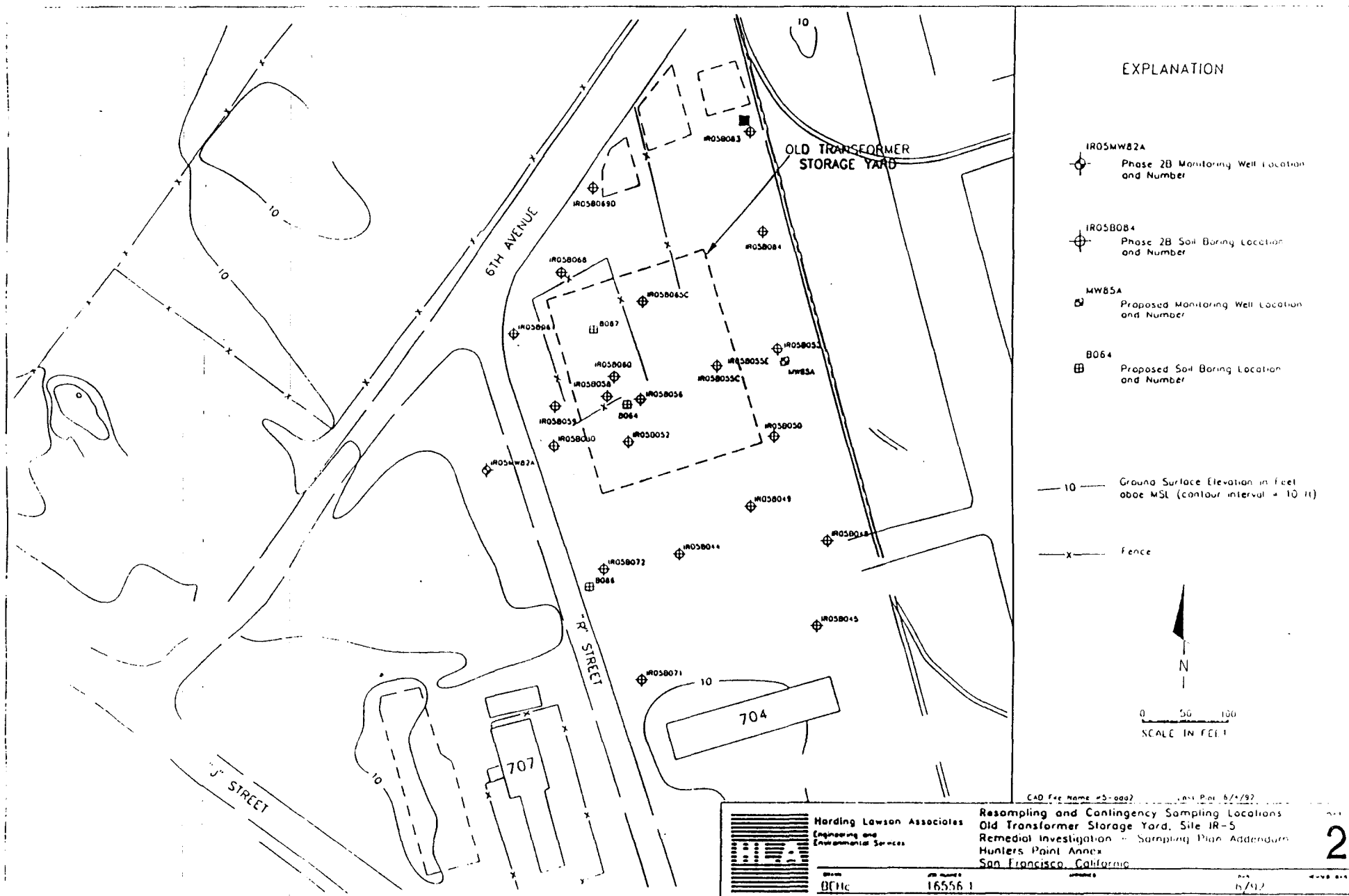
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AS A PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

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RECORDS MANAGEMENT SPECIALIST
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Proposed Resampling and Contingency Sampling
OU III

	Completed Phase IIA	Completed Phase IIB	Total Phases IIA & IIB	Proposed Resampling	Proposed Contingency	Proposed Total
Site IR-4						
Soil Borings	13	13	26	6	8	14
Shallow Wells	8	1	9	0	0	0
	Completed Phase IIA	Completed Phase IIB	Total Phases IIA & IIB	Proposed Resampling	Proposed Contingency	Proposed Total
Site IR-5						
Soil Borings	14	22	36	2	1	3
Shallow Wells	4	1	5	0	1	1
	Completed Phase IIA	Completed Phase IIB	Total Phases IIA & IIB	Proposed Resampling	Proposed Contingency	Proposed Total
TOTAL (IR-4 & IR-5)						
Soil Borings	27	35	62	8	9	17
Shallow Wells	12	2	14	0	1	1
TOTAL	39	37	76	8	10	18

Soil Sampling Program
OU III

Location	Type #	Total Depth (feet bgs)	Sampling Intervals (feet bgs)	Estimated Number of Samples	Analyses
<u>Site IR-4</u>					
Borings:					
19	C	5	0, 2.5, 5	3	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH, Asbestos
20	C	10	0, 2.5, 5, 10	4	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH, Asbestos
25	R	10	0, 2.5, 5, 10	4	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH
26	C	10	0, 2.5, 5, 10	4	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH, Asbestos
28	C	5	0, 2.5, 5	3	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH, Asbestos
30	R	5	0, 2.5, 5	3	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH
32, 34, 41	R	10	0, 2.5, 5, 10	12	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH
43	R	5	0, 2.5, 5	3	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH
44 & 45	C	10	0, 2.5, 5, 10	8	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH, Asbestos
46	C	10	0, 2.5, 5, 10	4	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH, Asbestos
47	C	5	0, 2.5, 5	3	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH, Asbestos
<u>Site IR-4 Estimated Total</u>				51	
<u>Site IR-5</u>					
Boring:					
64	R	10	0, 2.5, 5, 10	4	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH
86	C	20	0, 2.5, 5, 10 15, 20	6	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH, Asbestos
87	R	5	0, 2.5, 5	3	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH
Well:					
MW85A	C	25	0, 2.5, 5, 10, 15, 20, 25	7	VOCs, SOCs, TPH, TOG, Metals* Cr 6+, PCBs/Pest, pH, Asbestos
<u>Site IR-5 Estimated Total</u>				20	
OU III ESTIMATED TOTAL				71	

Notes:

- # R = resampling, C = contingency
bgs below ground surface
* Analyze for all CLP metals.

Estimated total number of samples does not include field or laboratory QC samples.

Groundwater Sampling Program
OU III

Location	Type #	Estimated Number of Groundwater Samples	Analyses
Site IR-4			
Wells:			
IR04MW09A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR04MW31A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR04MW35A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR04MW36A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR04MW37A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR04MW38A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR04MW39A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR04MW40A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
Site IR-4 Estimated Total		8	
Site IR-5			
Wells:			
IR04MW73A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR05MW74A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR05MW76A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR05MW77A	R	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
IR05MW85A	C	1	VOCs, SOCs, TPH, TDS, Anions TOG, PCBs/Pest, Metals*, Cr 6+
Site IR-5 Estimated Total		5	
OU III ESTIMATED TOTAL		13	

Notes:

- # R = resampling, C = contingency
* Analyze for all CLP metals.

Estimated total number of samples does not include field or laboratory QC samples.

Rationale for Soil Sampling Locations
OU III

Location	Type	Rationale
<u>Site IR-4</u>		
Borings:		
19 & 20	(contingency)	Evaluate the lateral extent of metals & VOCs northwest and southwest of Boring IR04B017
25	(resampling)	Resample to verify VOC contamination detected at Boring IR04B029 during Phase IIA
26	(contingency)	Evaluate the lateral extent of VOCs northwest of Boring IR04B029
28	(contingency)	Evaluate the lateral extent of PCBs & PAHs south of Boring IR04B015
30	(resampling)	Resample near Well IR04MW35
32, 34, & 41	(resampling)	Resample in the Scrap Yard to replace Borings IR04B006, IR04B021, & IR04B022
43	(resampling)	Resample at Triple A Site to replace Monitoring Well IR04MW37A
44, 45, & 46	(contingency)	Define the lateral extent of TPH at Boring IR04B008
47	(contingency)	Define the lateral extent of PAHs at Boring IR04B015
<u>Site IR-5</u>		
Boring:		
64	(resampling)	Resample to verify PCB contamination detected at Boring IR05B051 during Phase IIA
86	(contingency)	Define the lateral extent of Metals at Boring IR05B072
87	(resampling)	Resample to verify PCB contamination detected at Boring IR05B063
Well:		
MW85A	(contingency)	Assess soil chemistry and monitor groundwater in area where high concentrations of copper, lead, and mercury were detected at 21.25 feet bgs in Boring IR05B053

Contingency Schedule, OU III

[illegible]

PROJECT: OU3RIFS
CURRENT DATE: 06/10/92
AS OF DATE: 02/01/92

Contingency Schedule, OU III

[illegible]

ENCLOSURE (2)

SCHEDULE: OPERABLE UNIT 3

Operable Unit 3 consists of the following IR Sites, as defined in the RI/FS Workplan: IR-4 (Scrap Yard); IR-5 (Old Transformer Storage Yard).

<u>Document</u>	<u>Deadline</u>	<u>Estimated Dates</u>	<u>Proposed Revised Deadlines</u>
Final Summary of Findings Memorandum	02/21/92		Deleted
Draft RI Report	08/21/92		1/04/93
Draft Public Health and Environmental Evaluation (PHEE) Report	11/05/92		3/05/93
Draft Initial Screening of Alternatives	07/31/92		Deleted
Draft FS Report	01/11/93		5/06/93
Draft Proposed Plan (for Agency review)	45 days after submittal of draft FS Report	02/25/93	6/21/93
Draft Final RI Report*	Per Consultation Section	10/20/92	4/08/93
Draft Final PHEE Report*	Per Consultation Section	02/03/93	6/03/93
Draft Final FS Report*	Per Consultation Section	04/12/93	8/10/93
Draft Final Proposed Plan* (to Agencies)	60 days after submittal of draft Proposed Plan**	04/26/93	8/20/93
Final Proposed Plan Published	30 days after Draft Final Proposed Plan submitted to Agencies*	05/26/93	9/20/93
Start of Public Comment Period on Proposed Plan	5 business days after publication of Proposed Plan	06/03/93	9/27/93
Draft Record of Decision (ROD)**	60 days after end of public comment period	10/01/93	1/27/94
Final ROD* (from USN with no signature)	60 days after submittal of draft ROD	12/01/93	3/29/94
Final ROD Approval	30 days after submittal of Final ROD	12/31/93	4/28/94

- * Primary Document (subject to Dispute Resolution Procedures)
- ** Allows 15 days for Agency review; 45 days for US Navy response and revisions.
- + Allows 15 days for Agency review of draft Final Proposed Plan and 15 days to publish.
- ++ Includes responsiveness summary and schedules for draft remedial design, completion of construction, draft remedial action work plans, public operations and maintenance plan, and commencement of the remedial action.